

FCC SAR EVALUATION REPORT

In accordance with the requirements of
FCC 47 CFR Part 2(2.1093) and
IEEE Std 1528-2013

Product Name : 3G DESK PHONE

Trademark : LOGIC, UNONU, iSWAG

Model Name : FIXO 800

Family Model : Q800

Report No. : S24040802802001

FCC ID : O55131324

Prepared for

SWAGTEK

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TEST RESULT CERTIFICATION

Applicant's name SWAGTEK
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Manufacturer's Name SWAGTEK
Address..... 10205 NW 19th Street STE101Miami, FL 33172

Product description

Product name..... 3G DESK PHONE
Trademark LOGIC, UNONU, iSWAG
Model Name FIXO 800
Family Model..... Q800
FCC 47 CFR Part 2(2.1093)

Standards IEEE Std 1528-2013
Published RF exposure KDB procedures

This device described above has been tested by Shenzhen NTEK. In accordance with the measurement methods and procedures specified in IEEE Std 1528-2013 and KDB 865664 D01. Testing has shown that this device is capable of compliance with localized specific absorption rate (SAR) specified in FCC 47 CFR Part 2(2.1093). The test results in this report apply only to the tested sample of the stated device/equipment. Other similar device/equipment will not necessarily produce the same results due to production tolerance and measurement uncertainties.

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Test Sample Number S240408028002

Date of Test

Date (s) of performance of tests Apr. 25, 2024 ~ Apr. 26, 2024

Date of Issue May 06, 2024

Test Result **Pass**

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※ ※ Revision History ※ ※

REV.	DESCRIPTION	ISSUED DATE	REMARK
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1. General Information

1.1. RF exposure limits

(A).Limits for Occupational/Controlled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.4	8.0	20.0

(B).Limits for General Population/Uncontrolled Exposure (W/kg)

Whole-Body	Partial-Body	Hands, Wrists, Feet and Ankles
0.08	1.6	4.0

NOTE: **Whole-Body SAR** is averaged over the entire body, **partial-body SAR** is averaged over any 1 gram of tissue defined as a tissue volume in the shape of a cube. **SAR for hands, wrists, feet and ankles** is averaged over any 10 grams of tissue defined as a tissue volume in the shape of a cube.

Occupational/Controlled Environments:

Are defined as locations where there is exposure that may be incurred by people who are aware of the potential for exposure, (i.e. as a result of employment or occupation).

General Population/Uncontrolled Environments:

Are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure.

NOTE
TRUNK LIMIT
1.6 W/kg
APPLIED TO THIS EUT

1.2. Statement of Compliance

The maximum results of Specific Absorption Rate (SAR) found during testing for FIXO 800 are as follows.

RF Exposure Conditions	Equipment Class -Highest Reported SAR (W/kg)
	PCE
1-g Body (Separation distance of 10mm)	0.881

Note: This device is in compliance with Specific Absorption Rate (SAR) for general population/uncontrolled exposure limits (1.6 W/kg) specified in FCC 47 CFR Part 2(2.1093), and had been tested in accordance with the measurement methods and procedures specified in IEEE Std 1528-2013 & KDB 865664 D01.

1.3. EUT Description

Device Information			
Product Name	3G DESK PHONE		
Trade Name	LOGIC, UNONU, iSWAG		
Model Name	FIXO 800		
Family Model	Q800		
Model Difference	All models are the same circuit and RF module, except for the model name.		
FCC ID	O55131324		
Device Phase	Identical Prototype		
Exposure Category	General population / Uncontrolled environment		
Antenna	Integrated flat antenna		
Battery Information	DC 3.7V/1000mAh		
HW Version	KL1701_HW_V01		
SW Version	T107_N18_FIXO_800_0004_20220623_1406		
Device Operating Configurations			
Supporting Mode(s)	GSM 850/1900, WCDMA Band 2/5		
Test Modulation	GSM(GMSK), WCDMA(QPSK)		
Device Class	B		
Operating Frequency Range(s)	Band	Tx (MHz)	Rx (MHz)
	GSM 850	824-849	869-894
	GSM 1900	1850-1910	1930-1990
	WCDMA Band 2	1850-1910	1930-1990
	WCDMA Band 5	824-849	869-894
Power Class	4, tested with power level 5(GSM 850)		
	1, tested with power level 0(GSM 1900)		
	3, tested with power control "all 1"(WCDMA Band 2)		

	3, tested with power control "all 1"(WCDMA Band 5)
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1.4. Test specification(s)

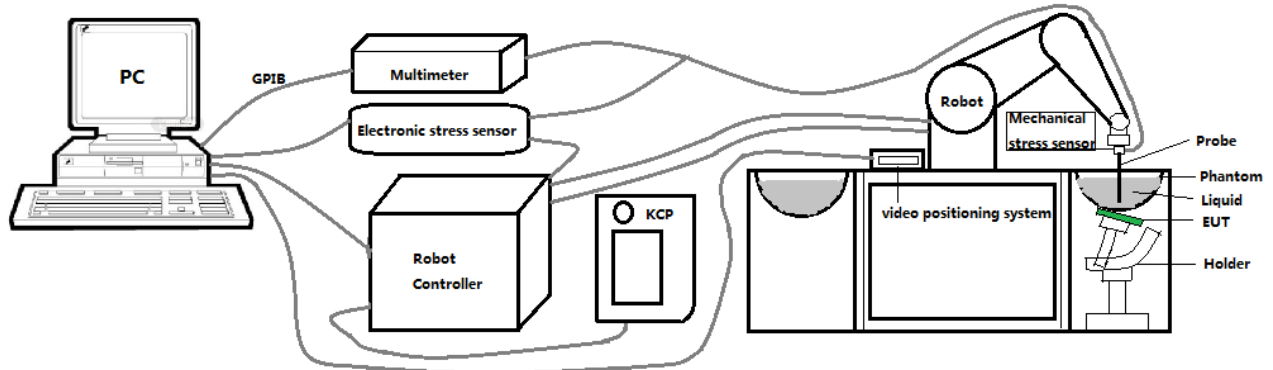
FCC 47 CFR Part 2(2.1093)
IEEE Std 1528-2013
KDB 865664 D01 SAR measurement 100 MHz to 6 GHz
KDB 865664 D02 RF Exposure Reporting
KDB 447498 D01 General RF Exposure Guidance
KDB 941225 D01 3G SAR Procedures

1.5. Ambient Condition

Ambient temperature	20°C – 24°C
Relative Humidity	30% – 70%

2. SAR Measurement System

2.1. SATIMO SAR Measurement Set-up Diagram



These measurements were performed with the automated near-field scanning system OPENSAR from SATIMO. The system is based on a high precision robot (working range: 901 mm), which positions the probes with a positional repeatability of better than ± 0.03 mm. The SAR measurements were conducted with dosimetric probe (manufactured by SATIMO), designed in the classical triangular configuration and optimized for dosimetric evaluation.

The first step of the field measurement is the evaluation of the voltages induced on the probe by the device under test. Probe diode detectors are nonlinear. Below the diode compression point, the output voltage is proportional to the square of the applied E-field; above the diode compression point, it is linear to the applied E-field. The compression point depends on the diode, and a calibration procedure is necessary for each sensor of the probe.

The Keithley multimeter reads the voltage of each sensor and send these three values to the PC. The corresponding E field value is calculated using the probe calibration factors, which are stored in the working directory. This evaluation includes linearization of the diode characteristics. The field calculation is done separately for each sensor. Each component of the E field is displayed on the "Dipole Area Scan Interface" and the total E field is displayed on the "3D Interface"

2.2. Robot

The SATIMO SAR system uses the high precision robots from KUKA. For the 6-axis controller system, the robot controller version (KUKA) from KUKA is used. The KUKA robot series have many features that are important for our application:



- High precision (repeatability ± 0.03 mm)
- High reliability (industrial design)
- Jerk-free straight movements
- Low ELF interference (the closed metallic construction shields against motor control fields)

2.3. E-Field Probe

This E-field detection probe is composed of three orthogonal dipoles linked to special Schottky diodes with low detection thresholds. The probe allows the measurement of electric fields in liquids such as the one defined in the IEEE and CENELEC standards.

For the measurements the Specific Dosimetric E-Field Probe 3423-EPGO-426 with following specifications is used



- Dynamic range: 0.01-100 W/kg
 - Tip Diameter : 2.5 mm
 - Distance between probe tip and sensor center: 1 mm
 - Distance between sensor center and the inner phantom surface: 2 mm (repeatability better than ± 1 mm).
 - Probe linearity: ± 0.06 dB
 - Axial isotropy: ± 0.01 dB
 - Hemispherical Isotropy: ± 0.01 dB
 - Calibration range: 650MHz to 5900MHz for head & body simulating liquid.
 - Lower detection limit: 8mW/kg
- Angle between probe axis (evaluation axis) and surface normal line: less than 30° .

2.3.1. E-Field Probe Calibration

Each probe needs to be calibrated according to a dosimetric assessment procedure with accuracy better than $\pm 10\%$. The spherical isotropy shall be evaluated and within ± 0.25 dB. The sensitivity parameters (Norm X, Norm Y, and Norm Z), the diode compression parameter (DCP) and the conversion factor (Conv F) of the probe are tested. The calibration data can be referred to appendix D of this report.

2.4. SAM phantoms

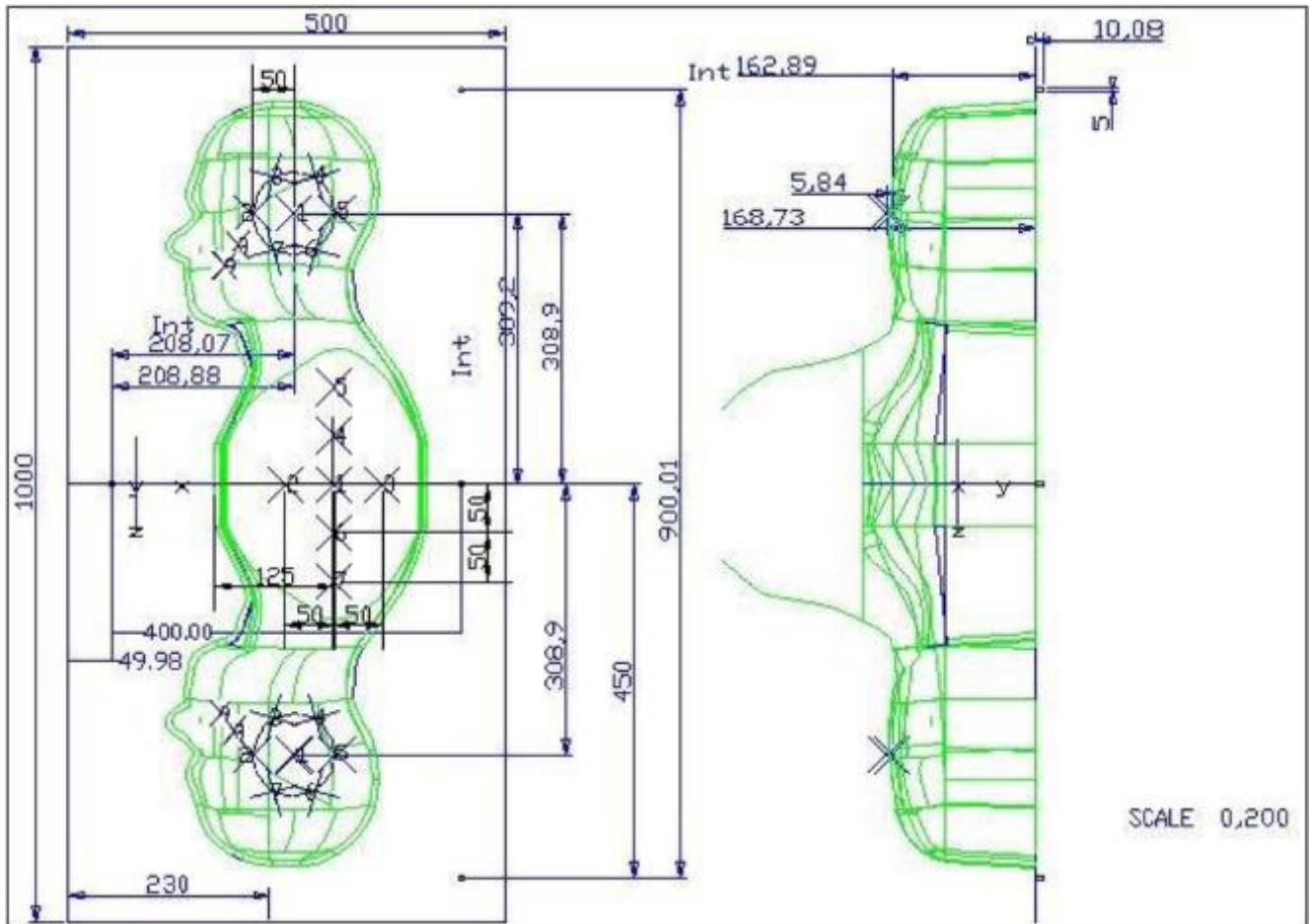
Photo of SAM phantom SN 16/15 SAM119



The SAM phantom is used to measure the SAR relative to people exposed to electro-magnetic field radiated by mobile phones.

2.4.1. Technical Data

Serial Number	Shell thickness	Filling volume	Dimensions	Positionner Material	Permittivity	Loss Tangent
SN 16/15 SAM119	2 mm ±0.2 mm	27 liters	Length:1000 mm Width:500 mm Height:200 mm	Gelcoat with fiberglass	3.4	0.02

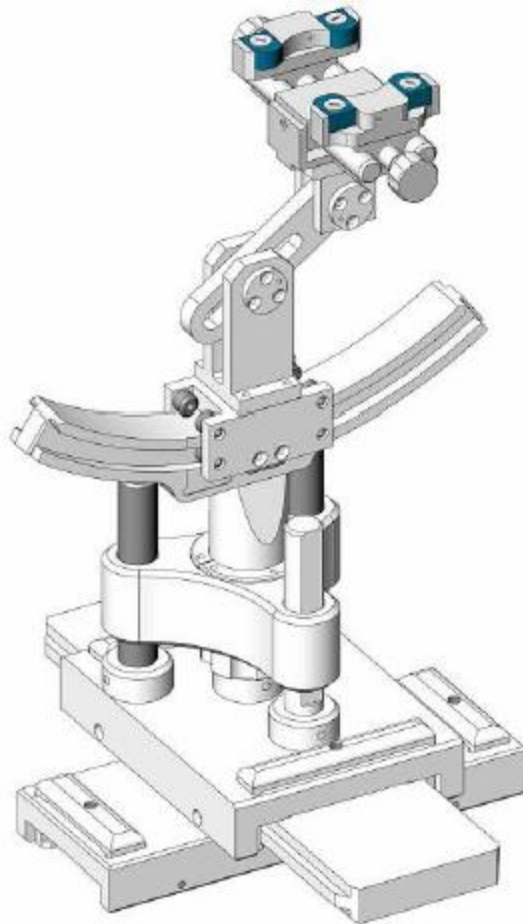


Serial Number	Left Head(mm)		Right Head(mm)		Flat Part(mm)	
	1	2	1	2	1	2
SN 16/15 SAM119	2	2.02	2	2.08	1	2.09
	3	2.05	3	2.06	2	2.06
	4	2.07	4	2.07	3	2.08
	5	2.08	5	2.08	4	2.10
	6	2.05	6	2.07	5	2.10
	7	2.05	7	2.05	6	2.07
	8	2.07	8	2.06	7	2.07
	9	2.08	9	2.06	-	-

The test, based on ultrasonic system, allows measuring the thickness with an accuracy of 10 µm.

2.5. Device Holder

The positioning system allows obtaining cheek and tilting position with a very good accuracy. In compliance with CENELEC, the tilt angle uncertainty is lower than 1 degree.



Serial Number	Holder Material	Permittivity	Loss Tangent
SN 16/15 MSH100	Delrin	3.7	0.005

2.6. Test Equipment List

This table gives a complete overview of the SAR measurement equipment.

Devices used during the test described are marked

	Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
					Last Cal.	Due Date
<input checked="" type="checkbox"/>	MVG	E FIELD PROBE	SSE2	3423-EPGO-426	Sep. 18, 2023	Sep. 17, 2024
<input type="checkbox"/>	MVG	750 MHz Dipole	SID750	SN 03/15 DIP 0G750-355	Feb. 21, 2024	Feb. 20, 2027
<input checked="" type="checkbox"/>	MVG	835 MHz Dipole	SID835	SN 03/15 DIP 0G835-347	Feb. 21, 2024	Feb. 20, 2027
<input type="checkbox"/>	MVG	900 MHz Dipole	SID900	SN 03/15 DIP 0G900-348	Feb. 21, 2024	Feb. 20, 2027
<input type="checkbox"/>	MVG	1800 MHz Dipole	SID1800	SN 03/15 DIP 1G800-349	Feb. 21, 2024	Feb. 20, 2027
<input checked="" type="checkbox"/>	MVG	1900 MHz Dipole	SID1900	SN 03/15 DIP 1G900-350	Feb. 21, 2024	Feb. 20, 2027
<input type="checkbox"/>	MVG	2000 MHz Dipole	SID2000	SN 03/15 DIP 2G000-351	Feb. 21, 2024	Feb. 20, 2027
<input type="checkbox"/>	MVG	2300 MHz Dipole	SID2300	SN 03/16 DIP 2G300-358	Feb. 21, 2024	Feb. 20, 2027
<input type="checkbox"/>	MVG	2450 MHz Dipole	SID2450	SN 03/15 DIP 2G450-352	Feb. 21, 2024	Feb. 20, 2027
<input type="checkbox"/>	MVG	2600 MHz Dipole	SID2600	SN 03/15 DIP 2G600-356	Feb. 21, 2024	Feb. 20, 2027
<input type="checkbox"/>	MVG	5000 MHz Dipole	SWG5500	SN 13/14 WGA 33	Feb. 21, 2024	Feb. 20, 2027
<input checked="" type="checkbox"/>	MVG	Liquid measurement Kit	SCLMP	SN 21/15 OCPG 72	NCR	NCR
<input checked="" type="checkbox"/>	MVG	Power Amplifier	N.A	AMPLISAR_28/14_003	NCR	NCR
<input checked="" type="checkbox"/>	KEITHLEY	Millivoltmeter	2000	4072790	NCR	NCR
<input checked="" type="checkbox"/>	R&S	Universal radio communication tester	CMU200	117858	May 29, 2023	May 28, 2024
<input type="checkbox"/>	R&S	Wideband radio communication tester	CMW500	103917	May 29, 2023	May 28, 2024
<input checked="" type="checkbox"/>	HP	Network	8753D	3410J01136	May 29,	May 28,

		Analyzer			2023	2024
<input checked="" type="checkbox"/>	Agilent	MXG Vector Signal Generator	N5182A	MY47070317	May 29, 2023	May 28, 2024
<input checked="" type="checkbox"/>	Agilent	Power meter	E4419B	MY45102538	May 29, 2023	May 28, 2024
<input checked="" type="checkbox"/>	Agilent	Power sensor	E9301A	MY41495644	May 29, 2023	May 28, 2024
<input checked="" type="checkbox"/>	Agilent	Power sensor	E9301A	US39212148	May 29, 2023	May 28, 2024
<input checked="" type="checkbox"/>	MCLI/USA	Directional Coupler	CB11-20	0D2L51502	Jul. 04, 2023	Jul. 03, 2024
<input checked="" type="checkbox"/>	N/A	Thermometer	N/A	LES-085	Mar. 27, 2023	Mar. 26, 2026
<input checked="" type="checkbox"/>	MVG	SAM Phantom	SSM2	SN 16/15 SAM119	NCR	NCR
<input checked="" type="checkbox"/>	MVG	Device Holder	SMPPD	SN 16/15 MSH100	NCR	NCR
<input checked="" type="checkbox"/>	Shenzhen Tianxu Communication Technology Co., Ltd.	Human Simulating Liquid	Head 835	Head 835	NCR	NCR
<input checked="" type="checkbox"/>	Shenzhen Tianxu Communication Technology Co., Ltd.	Human Simulating Liquid	Head 1900	Head 1900	NCR	NCR

3. SAR Measurement Procedures

The measurement procedures are as follows:

<Conducted power measurement>

- (a) For WWAN power measurement, use base station simulator to configure EUT WWAN transmission in conducted connection with RF cable, at maximum power in each supported wireless interface and frequency band.
- (b) Read the WWAN RF power level from the base station simulator.
- (c) For WLAN/Bluetooth power measurement, use engineering software to configure EUT WLAN/Bluetooth continuously transmission, at maximum RF power in each supported wireless interface and frequency band.
- (d) Connect EUT RF port through RF cable to the power meter, and measure WLAN/Bluetooth output power.

<SAR measurement>

- (a) Use base station simulator to configure EUT WWAN transmission in radiated connection, and engineering software to configure EUT WLAN/Bluetooth continuously transmission, at maximum RF power, in the highest power channel.
- (b) Place the EUT in the positions as Appendix A demonstrates.
- (c) Set scan area, grid size and other setting on the OPENSAR software.
- (d) Measure SAR results for the highest power channel on each testing position.
- (e) Find out the largest SAR result on these testing positions of each band.
- (f) Measure SAR results for other channels in worst SAR testing position if the reported SAR of highest power channel is larger than 0.8 W/kg.

According to the test standard, the recommended procedure for assessing the peak spatial-average SAR value consists of the following steps:

- (a) Power reference measurement
- (b) Area scan
- (c) Zoom scan
- (d) Power drift measurement

3.1. Power Reference

The Power Reference Measurement and Power Drift Measurements are for monitoring the power drift of the device under test in the batch process. The minimum distance of probe sensors to surface determines the closest measurement point to phantom surface. This distance cannot be smaller than the distance of sensor calibration points to probe tip as defined in the probe properties.

3.2. Area scan & Zoom scan

The area scan is a 2D scan to find the hot spot location on the DUT. The zoom scan is a 3D scan above the hot spot to calculate the 1g and 10g SAR value.

Measurement of the SAR distribution with a grid of 8 to 16 mm * 8 to 16 mm and a constant distance to the inner surface of the phantom. Since the sensors cannot directly measure at the inner phantom surface, the values between the sensors and the inner phantom surface are extrapolated. With these values the area of the maximum SAR is calculated by an interpolation scheme. Around this point, a cube of 30 * 30 * 30 mm or 32 * 32 * 32 mm is assessed by measuring 5 or 8 * 5 or 8 * 4 or 5 mm. With these data, the peak spatial-average SAR value can be calculated.

From the scanned SAR distribution, identify the position of the maximum SAR value, in addition identify the positions of any local maxima with SAR values within 2 dB of the maximum value that will not be within the zoom scan of other peaks; additional peaks shall be measured only when the primary peak is within 2 dB of the SAR compliance limit (e.g., 1 W/kg for 1,6 W/kg 1 g limit, or 1,26 W/kg for 2 W/kg, 10 g limit).

Area scan & Zoom scan scan parameters extracted from FCC KDB 865664 D01 SAR measurement 100 MHz to 6 GHz.

		≤ 3 GHz	> 3 GHz	
Maximum distance from closest measurement point (geometric center of probe sensors) to phantom surface		5 ± 1 mm	½·δ·ln(2) ± 0.5 mm	
Maximum probe angle from probe axis to phantom surface normal at the measurement location		30° ± 1°	20° ± 1°	
Maximum area scan spatial resolution: Δx _{Area} , Δy _{Area}		≤ 2 GHz: ≤ 15 mm 2 – 3 GHz: ≤ 12 mm	3 – 4 GHz: ≤ 12 mm 4 – 6 GHz: ≤ 10 mm	
		When the x or y dimension of the test device, in the measurement plane orientation, is smaller than the above, the measurement resolution must be ≤ the corresponding x or y dimension of the test device with at least one measurement point on the test device.		
Maximum zoom scan spatial resolution: Δx _{Zoom} , Δy _{Zoom}		≤ 2 GHz: ≤ 8 mm 2 – 3 GHz: ≤ 5 mm*	3 – 4 GHz: ≤ 5 mm* 4 – 6 GHz: ≤ 4 mm*	
Maximum zoom scan spatial resolution, normal to phantom surface	uniform grid: Δz _{Zoom} (n)	≤ 5 mm	3 – 4 GHz: ≤ 4 mm 4 – 5 GHz: ≤ 3 mm 5 – 6 GHz: ≤ 2 mm	
	graded grid	Δz _{Zoom} (1): between 1 st two points closest to phantom surface	≤ 4 mm	3 – 4 GHz: ≤ 3 mm 4 – 5 GHz: ≤ 2.5 mm 5 – 6 GHz: ≤ 2 mm
		Δz _{Zoom} (n>1): between subsequent points	≤ 1.5·Δz _{Zoom} (n-1)	
Minimum zoom scan volume	x, y, z	≥ 30 mm	3 – 4 GHz: ≥ 28 mm 4 – 5 GHz: ≥ 25 mm 5 – 6 GHz: ≥ 22 mm	

Note: δ is the penetration depth of a plane-wave at normal incidence to the tissue medium; see draft standard IEEE P1528-2011 for details.

* When zoom scan is required and the *reported* SAR from the *area scan based 1-g SAR estimation* procedures of KDB 447498 is ≤ 1.4 W/kg, ≤ 8 mm, ≤ 7 mm and ≤ 5 mm zoom scan resolution may be applied, respectively, for 2 GHz to 3 GHz, 3 GHz to 4 GHz and 4 GHz to 6 GHz.

3.3. Description of interpolation/extrapolation scheme

The local SAR inside the phantom is measured using small dipole sensing elements inside a probe body. The probe tip must not be in contact with the phantom surface in order to minimise measurements errors, but the highest local SAR will occur at the surface of the phantom.

An extrapolation is used to determine these highest local SAR values. The extrapolation is based on a fourth-order least-square polynomial fit of measured data. The local SAR value is then extrapolated from the liquid surface with a 1 mm step.

The measurements have to be performed over a limited time (due to the duration of the battery) so the step of measurement is high. It could vary between 5 and 8 mm. To obtain an accurate assessment of the maximum SAR averaged over 10 grams and 1 gram requires a very fine resolution in the three dimensional scanned data array.

3.4. Volumetric Scan

The volumetric scan consists of a full 3D scan over a specific area. This 3D scan is useful for multi Tx SAR measurement. Indeed, it is possible with OpenSAR to add, point by point, several volumetric scans to calculate the SAR value of the combined measurement as it is defined in the standard IEEE1528 and IEC62209.

3.5. Power Drift

All SAR testing is under the EUT installed with a full charged battery and transmit maximum output power. In OpenSAR measurement software, the power reference measurement and power drift measurement procedures are used for monitoring the power drift of EUT during SAR test. Both these procedures measure the field at a specified reference position before and after the SAR testing. The software will calculate the field difference in V/m. If the power drifts more than $\pm 5\%$, the SAR will be retested.

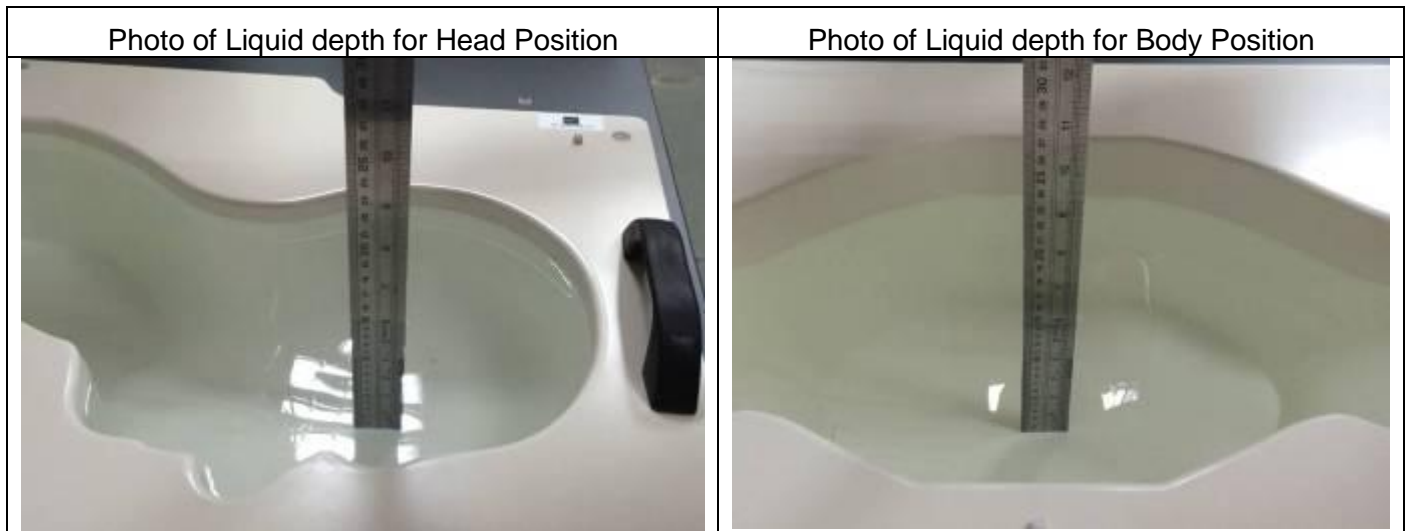
4. System Verification Procedure

4.1. Tissue Verification

The following tissue formulations are provided for reference only as some of the parameters have not been thoroughly verified. The composition of ingredients may be modified accordingly to achieve the desired target tissue parameters required for routine SAR evaluation.

Ingredients (% of weight)	Head Tissue									
	750	835	900	1800	1900	2000	2450	2600	5200	5800
Frequency Band (MHz)										
Water	34.40	34.40	34.40	55.36	55.36	57.87	57.87	57.87	65.53	65.53
NaCl	0.79	0.79	0.79	0.35	0.35	0.16	0.16	0.16	0.00	0.00
1,2-Propanediol	64.81	64.81	64.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Triton X-100	0.00	0.00	0.00	30.45	30.45	19.97	19.97	19.97	24.24	24.24
DGBE	0.00	0.00	0.00	13.84	13.84	22.00	22.00	22.00	10.23	10.23

For SAR measurement of the field distribution inside the phantom, the phantom must be filled with homogeneous tissue simulating liquid to a depth of at least 15 cm. For head SAR testing, the liquid depth from the ear reference point (ERP) of the phantom to the liquid top surface is larger than 15 cm.



4.1.1. Tissue Dielectric Parameter Check Results

The simulating liquids should be checked at the beginning of a series of SAR measurements to determine if the dielectric parameters are within the tolerances of the specified target values. The measured conductivity and relative permittivity should be within $\pm 5\%$ of the target values.

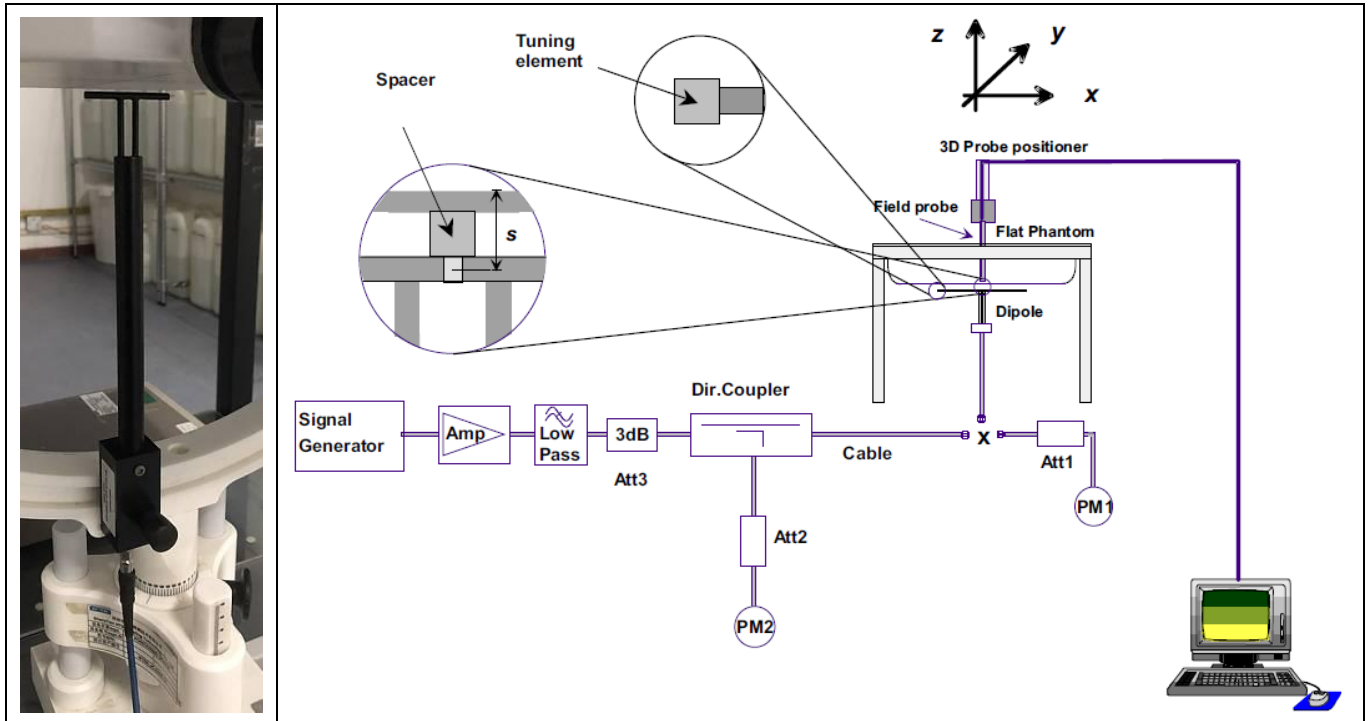
Tissue Type	Measured Frequency (MHz)	Target Tissue		Measured Tissue		Liquid Temp.	Test Date
		$\epsilon_r (\pm 5\%)$	σ (S/m) ($\pm 5\%$)	ϵ_r	σ (S/m)		
Head 850	835	41.50 (39.43~43.58)	0.90 (0.86~0.95)	41.40	0.90	21.7 °C	Apr. 26, 2024
Head 1900	1900	40.00 (38.00~42.00)	1.40 (1.33~1.47)	39.08	1.46	21.5 °C	Apr. 25, 2024

NOTE: The dielectric parameters of the tissue-equivalent liquid should be measured under similar ambient conditions and within 2 °C of the conditions expected during the SAR evaluation to satisfy protocol requirements.

4.2. System Verification Procedure

The system verification is performed for verifying the accuracy of the complete measurement system and performance of the software. The dipole is connected to the signal source consisting of signal generator and amplifier via a directional coupler, N-connector cable and adaption to SMA. It is fed with a power of 100mW (below 5GHz) or 100mW (above 5GHz). To adjust this power a power meter is used. The power sensor is connected to the cable before the system verification to measure the power at this point and do adjustments at the signal generator. At the outputs of the directional coupler both return loss as well as forward power are controlled during the system verification to make sure that emitted power at the dipole is kept constant. This can also be checked by the power drift measurement after the test (result on plot).

The system verification is shown as below picture:



4.2.1. System Verification Results

Comparing to the original SAR value provided by SATIMO, the verification data should be within its specification of $\pm 10\%$. Below table shows the target SAR and measured SAR after normalized to 1W input power. The table below indicates the system performance verification can meet the variation criterion and the plots can be referred to Appendix B of this report.

System Verification	Target SAR (1W) ($\pm 10\%$)		Measured SAR (Normalized to 1W)		Liquid Temp.	Test Date
	1-g (W/Kg)	10-g (W/Kg)	1-g (W/Kg)	10-g (W/Kg)		
835MHz	9.40 (8.46~10.34)	6.28 (5.65~6.91)	9.18	6.08	21.7 °C	Apr. 26, 2024
1900MHz	39.69 (35.72~43.66)	20.92 (18.83~23.01)	43.12	19.88	21.5 °C	Apr. 25, 2024

5. SAR Measurement variability and uncertainty

5.1. SAR measurement variability

Per KDB865664 D01 SAR measurement 100 MHz to 6 GHz, SAR measurement variability must be assessed for each frequency band, which is determined by the SAR probe calibration point and tissue-equivalent medium used for the device measurements. The additional measurements are repeated after the completion of all measurements requiring the same head or body tissue-equivalent medium in a frequency band. The test device should be returned to ambient conditions (normal room temperature) with the battery fully charged before it is re-mounted on the device holder for the repeated measurement(s) to minimize any unexpected variations in the repeated results.

- 1) Repeated measurement is not required when the original highest measured SAR is < 0.80 W/kg; steps 2) through 4) do not apply.
- 2) When the original highest measured SAR is ≥ 0.80 W/kg, repeat that measurement once.
- 3) Perform a second repeated measurement only if the ratio of largest to smallest SAR for the original and first repeated measurements is > 1.20 or when the original or repeated measurement is ≥ 1.45 W/kg (~ 10% from the 1-g SAR limit).
- 4) Perform a third repeated measurement only if the original, first or second repeated measurement is ≥ 1.5 W/kg and the ratio of largest to smallest SAR for the original, first and second repeated measurements is > 1.20 .

5.2. SAR measurement uncertainty

Per KDB865664 D01 SAR Measurement 100 MHz to 6 GHz, when the highest measured 1-g SAR within a frequency band is < 1.5 W/kg, the extensive SAR measurement uncertainty analysis described in IEEE Std 1528-2013 is not required in SAR reports submitted for equipment approval. The equivalent ratio (1.5/1.6) is applied to extremity and occupational exposure conditions.

6. RF Exposure Positions

6.1. Devices with hinged or swivel antenna(s)

For devices that employ one or more external antennas with variable positions (e.g. antenna extended, retracted, rotated), these shall be positioned in accordance with the user instructions provided by the manufacturer. For a device with only one antenna, if no intended antenna position is specified, tests shall be performed if applicable in both the horizontal and vertical positions relative to the phantom, and with the antenna oriented away from the body of the DUT (See figure 6.1) and/or with the antenna extended and retracted such as to obtain the highest exposure condition. For antennas that may be rotated through one or two planes, an evaluation should be made and documented in the measurement report to the highest exposure scenario and only that position(s) need(s) to be tested. Adjust the distance between the device surface and the flat phantom to 10mm.

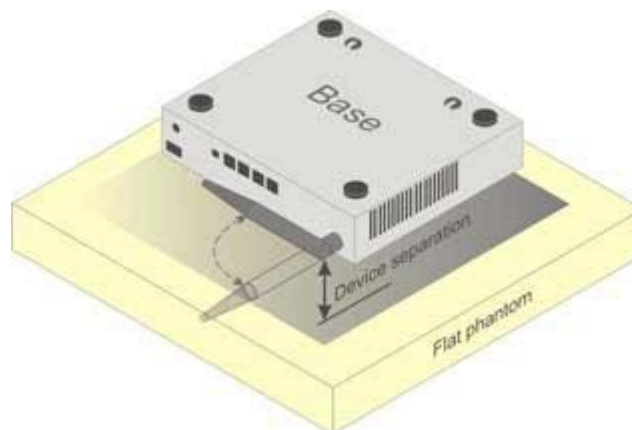


Figure 6.1 –Device with swivel antenna (example of desktop device)

7. RF Output Power

7.1. GSM Conducted Power

Band GSM850		Burst-Averaged output Power (dBm)			Frame-Averaged output Power (dBm)			
Tx Channel	Tune-up (dBm)	128	189	251	Tune-up	128	189	251
Frequency (MHz)		824.2	836.4	848.8	(dBm)	824.2	836.4	848.8
GSM (GMSK)	33.00	32.93	32.65	32.80	23.97	23.90	23.62	23.77
Band GSM1900		Burst-Averaged output Power (dBm)			Frame-Averaged output Power (dBm)			
Tx Channel	Tune-up (dBm)	512	661	810	Tune-up	512	661	810
Frequency (MHz)		1850.2	1880.0	1909.8	(dBm)	1850.2	1880.0	1909.8
GSM (GMSK)	30.50	30.06	30.18	30.15	21.47	21.03	21.15	21.12

Note: The frame-averaged power is linearly scaled the maximum burst averaged power over 8 time slots.

The calculated method are shown as below:

Frame-averaged power = Maximum burst averaged power (1 TS) - 9.03 dB

Frame-averaged power = Maximum burst averaged power (2 TS) - 6.02 dB

Frame-averaged power = Maximum burst averaged power (3 TS) - 4.26 dB

Frame-averaged power = Maximum burst averaged power (4 TS) - 3.01 dB

7.2. WCDMA Conducted Power

WCDMA Band 2		Burst-Averaged output Power (dBm)		
Tx Channel	Tune-up (dBm)	9262	9400	9538
Frequency (MHz)		1852.4	1880	1907.6
RMC12.2K	24.00	22.92	23.36	23.51
HSDPA Sub 1	23.00	22.67	22.40	22.44
HSDPA Sub 2	22.50	22.17	22.12	22.14
HSDPA Sub 3	22.00	21.72	21.80	21.73
HSDPA Sub 4	22.00	21.66	21.64	21.73
HSUPA Sub 1	23.00	22.60	22.24	22.32
HSUPA Sub 2	22.50	22.45	22.38	22.37
HSUPA Sub 3	22.50	22.07	21.80	22.07
HSUPA Sub 4	22.50	22.37	22.07	22.39
HSUPA Sub 5	22.50	22.11	22.14	21.96
WCDMA Band 5		Burst-Averaged output Power (dBm)		
Tx Channel	Tune-up (dBm)	4132	4182	4233
Frequency (MHz)		826.4	836.4	846.6
RMC12.2K	22.50	22.07	22.11	22.18

HSDPA Sub 1	22.50	22.14	21.63	21.85
HSDPA Sub 2	22.00	21.78	21.41	21.65
HSDPA Sub 3	22.00	21.58	21.00	21.46
HSDPA Sub 4	21.50	21.16	20.94	21.21
HSUPA Sub 1	22.50	22.09	21.53	21.82
HSUPA Sub 2	22.50	22.07	21.64	21.89
HSUPA Sub 3	22.00	21.70	21.30	21.65
HSUPA Sub 4	22.00	21.93	21.59	21.73
HSUPA Sub 5	22.00	21.90	21.56	21.81

8. SAR Results

8.1. SAR measurement results

8.1.1. SAR measurement Result of GSM850

Test Position	Test channel /Freq.	Mode	Separation distance (mm)	SAR Value (W/kg)		Power Drift(%)	Conducted Power (dBm)	Tune-up Power (dBm)	Scaled SAR 1-g (W/Kg)	Date
				1-g	10-g					
Back Side and Ant Vertical	189/836.4	GSM Voice	10	0.175	0.106	0.56	32.65	33.00	0.190	2024/4/26
Right Side and Ant Horizontal	189/836.4	GSM Voice	10	0.389	0.203	-1.46	32.65	33.00	0.422	2024/4/26

8.1.2. SAR measurement Result of GSM1900

Test Position	Test channel /Freq.	Mode	Separation distance (mm)	SAR Value (W/kg)		Power Drift(%)	Conducted Power (dBm)	Tune-up Power (dBm)	Scaled SAR 1-g (W/Kg)	Date
				1-g	10-g					
Back Side and Ant Vertical	661/1880	GSM Voice	10	0.340	0.187	2.36	30.18	30.50	0.366	2024/4/25
Right Side and Ant Horizontal	661/1880	GSM Voice	10	0.704	0.360	-0.08	30.18	30.50	0.758	2024/4/25

8.1.3. SAR measurement Result of WCDMA Band 2

Test Position	Test channel /Freq.	Mode	Separation distance (mm)	SAR Value (W/kg)		Power Drift(%)	Conducted Power (dBm)	Tune-up Power (dBm)	Scaled SAR 1-g (W/Kg)	Date
				1-g	10-g					
Back Side and Ant Vertical	9400/1880	RMC12.2K	10	0.602	0.411	1.32	23.36	24.00	0.698	2024/4/25
Right Side and Ant Horizontal	9400/1880	RMC12.2K	10	0.760	0.403	-1.04	23.36	24.00	0.881	2024/4/25
Repeated	9400/1880	RMC12.2K	10	0.757	0.400	1.10	23.36	24.00	0.877	2024/4/25
Right Side and Ant Horizontal	9262/1852.4	RMC12.2K	10	0.682	0.356	-0.65	22.92	24.00	0.875	2024/4/25
Right Side and Ant Horizontal	9538/1907.6	RMC12.2K	10	0.674	0.342	-4.03	23.51	24.00	0.755	2024/4/25

8.1.4. SAR measurement Result of WCDMA Band 5

Test Position	Test channel /Freq.	Mode	Separation distance (mm)	SAR Value (W/kg)		Power Drift(%)	Conducted Power (dBm)	Tune-up Power (dBm)	Scaled SAR 1-g (W/Kg)	Date
				1-g	10-g					
Back Side and Ant Vertical	4182/836.4	RMC12.2K	10	0.168	0.109	1.23	22.11	22.50	0.184	2024/4/26
Right Side and Ant Horizontal	4182/836.4	RMC12.2K	10	0.254	0.143	0.22	22.11	22.50	0.278	2024/4/26

9. Appendix A. Photo documentation

Refer to appendix Test Setup photo---SAR

10. Appendix B. System Check Plots

Table of contents
MEASUREMENT 1 System Performance Check - 835MHz
MEASUREMENT 2 System Performance Check - 1900MHz

MEASUREMENT 1

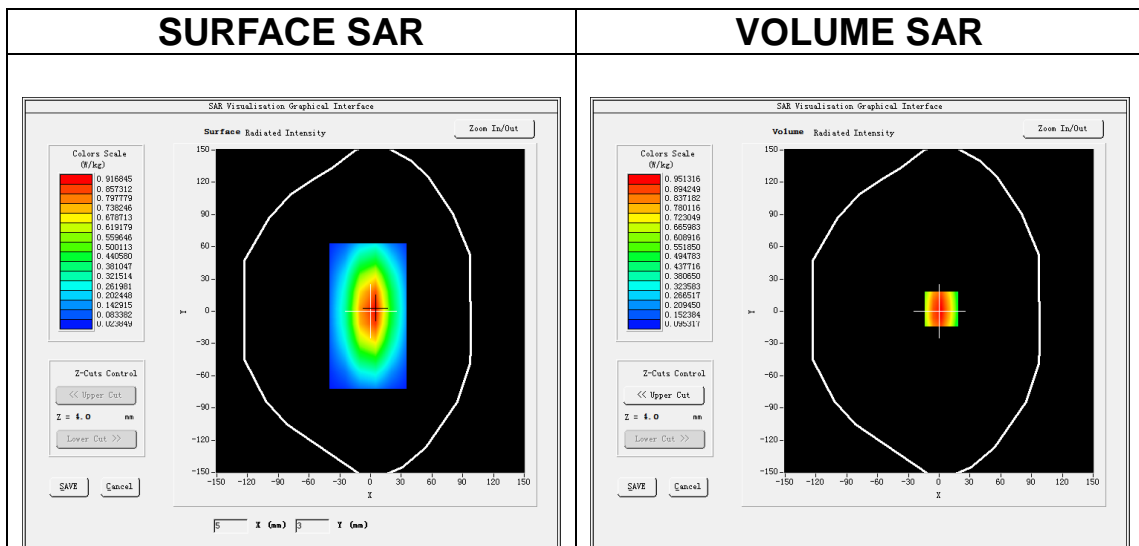
Date of measurement: 26/4/2024

A. Experimental conditions.

Area Scan	<u>dx=15mm dy=15mm, h= 5.00 mm</u>
ZoomScan	<u>5x5x7, dx=8mm dy=8mm dz=5mm</u>
Phantom	<u>Validation plane</u>
Device Position	<u>Dipole</u>
Band	<u>CW835</u>
Channels	<u>Middle</u>
Signal	<u>CW (Crest factor: 1.0)</u>
ConvF	<u>2.32</u>

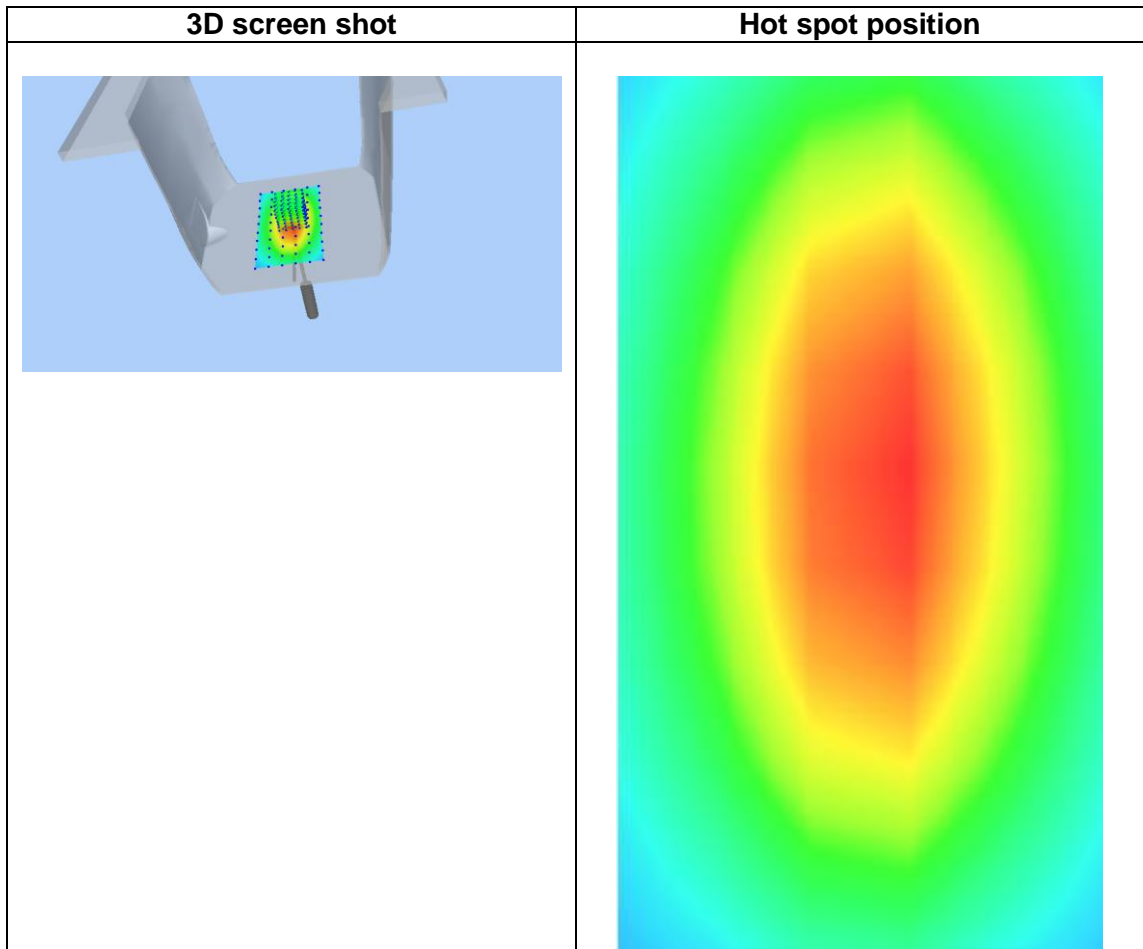
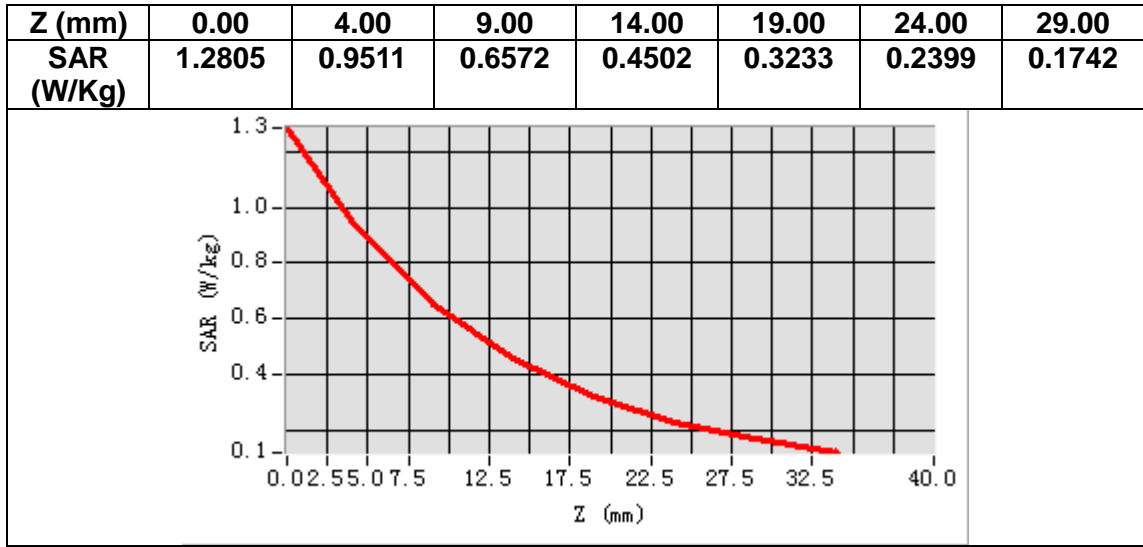
B. SAR Measurement Results

Frequency (MHz)	835.000000
Relative permittivity (real part)	41.395281
Relative permittivity (imaginary part)	19.400454
Conductivity (S/m)	0.899966
Variation (%)	1.410000



Maximum location: X=2.00, Y=2.00
SAR Peak: 1.29 W/kg

SAR 10g (W/Kg)	0.608016
SAR 1g (W/Kg)	0.918147



MEASUREMENT 2

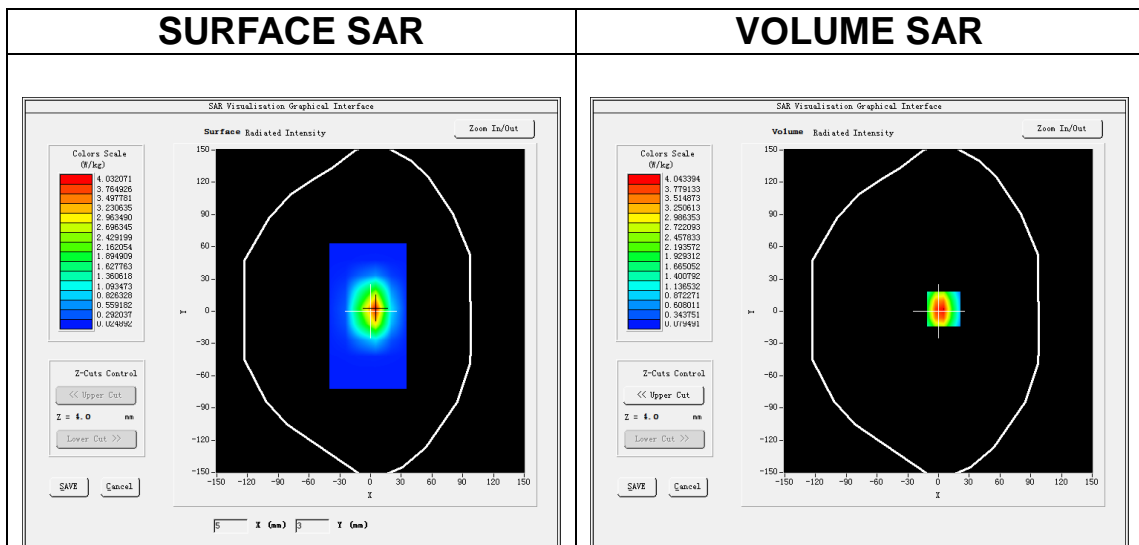
Date of measurement: 25/4/2024

A. Experimental conditions.

Area Scan	<u>dx=15mm dy=15mm, h= 5.00 mm</u>
ZoomScan	<u>5x5x7, dx=8mm dy=8mm dz=5mm</u>
Phantom	<u>Validation plane</u>
Device Position	<u>Dipole</u>
Band	<u>CW1900</u>
Channels	<u>Middle</u>
Signal	<u>CW (Crest factor: 1.0)</u>
ConvF	<u>2.63</u>

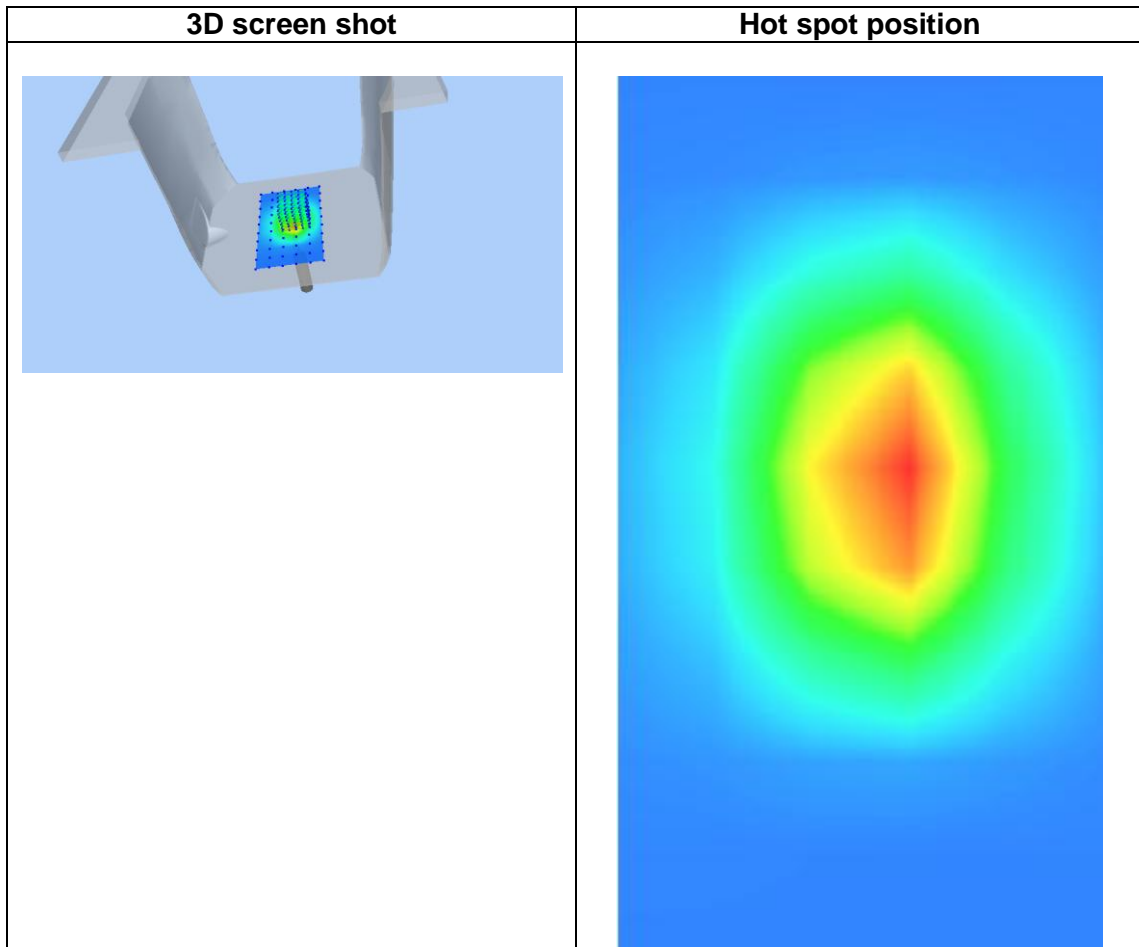
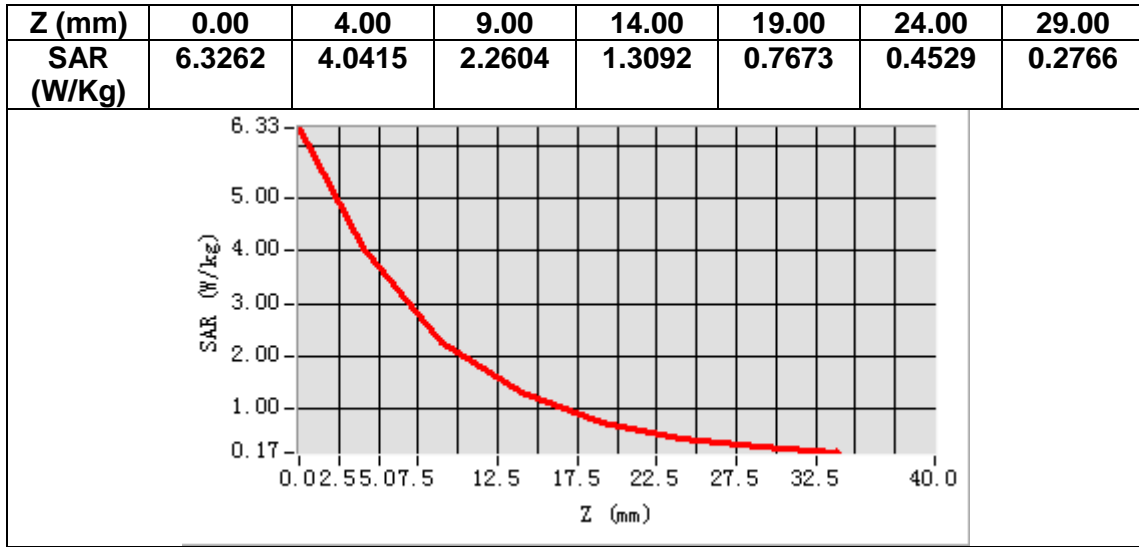
B. SAR Measurement Results

Frequency (MHz)	1900.000000
Relative permittivity (real part)	39.077523
Relative permittivity (imaginary part)	13.860934
Conductivity (S/m)	1.463099
Variation (%)	-1.390000



Maximum location: X=5.00, Y=2.00
SAR Peak: 6.70 W/kg

SAR 10g (W/Kg)	1.988105
SAR 1g (W/Kg)	4.312298



11. Appendix C. Plots of High SAR Measurement

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MEASUREMENT 1 GSM 850
MEASUREMENT 2 GSM 1900
MEASUREMENT 3 WCDMA Band 2
MEASUREMENT 4 WCDMA Band 5

MEASUREMENT 1

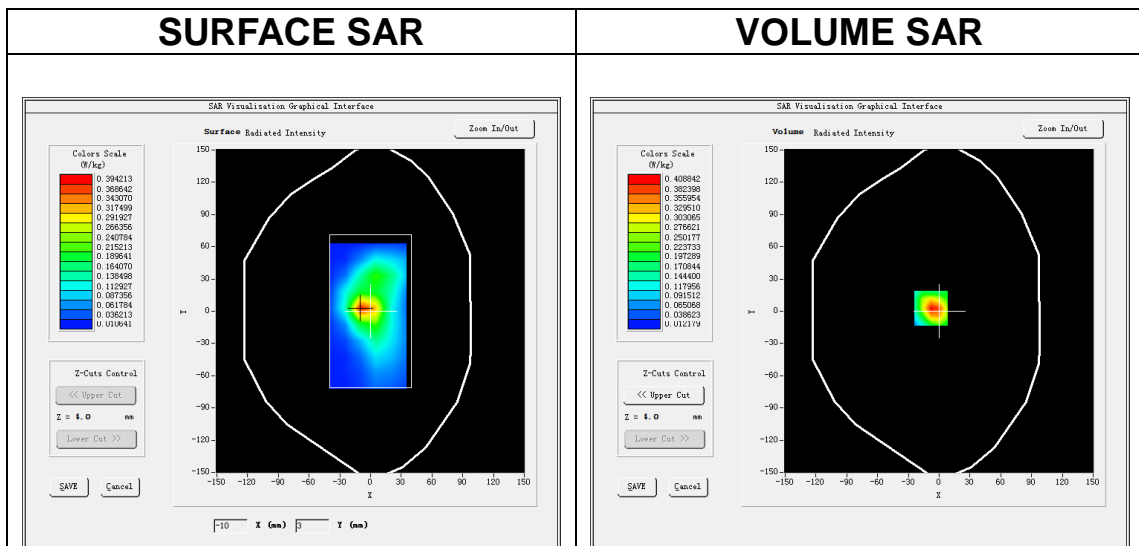
Date of measurement: 26/4/2024

A. Experimental conditions.

Area Scan	<u>dx=15mm dy=15mm, h= 5.00 mm</u>
ZoomScan	<u>5x5x7, dx=8mm dy=8mm dz=5mm</u>
Phantom	<u>Validation plane</u>
Device Position	<u>Body</u>
Band	<u>GSM850</u>
Channels	<u>Middle</u>
Signal	<u>TDMA (Crest factor: 8.0)</u>
ConvF	<u>2.32</u>

B. SAR Measurement Results

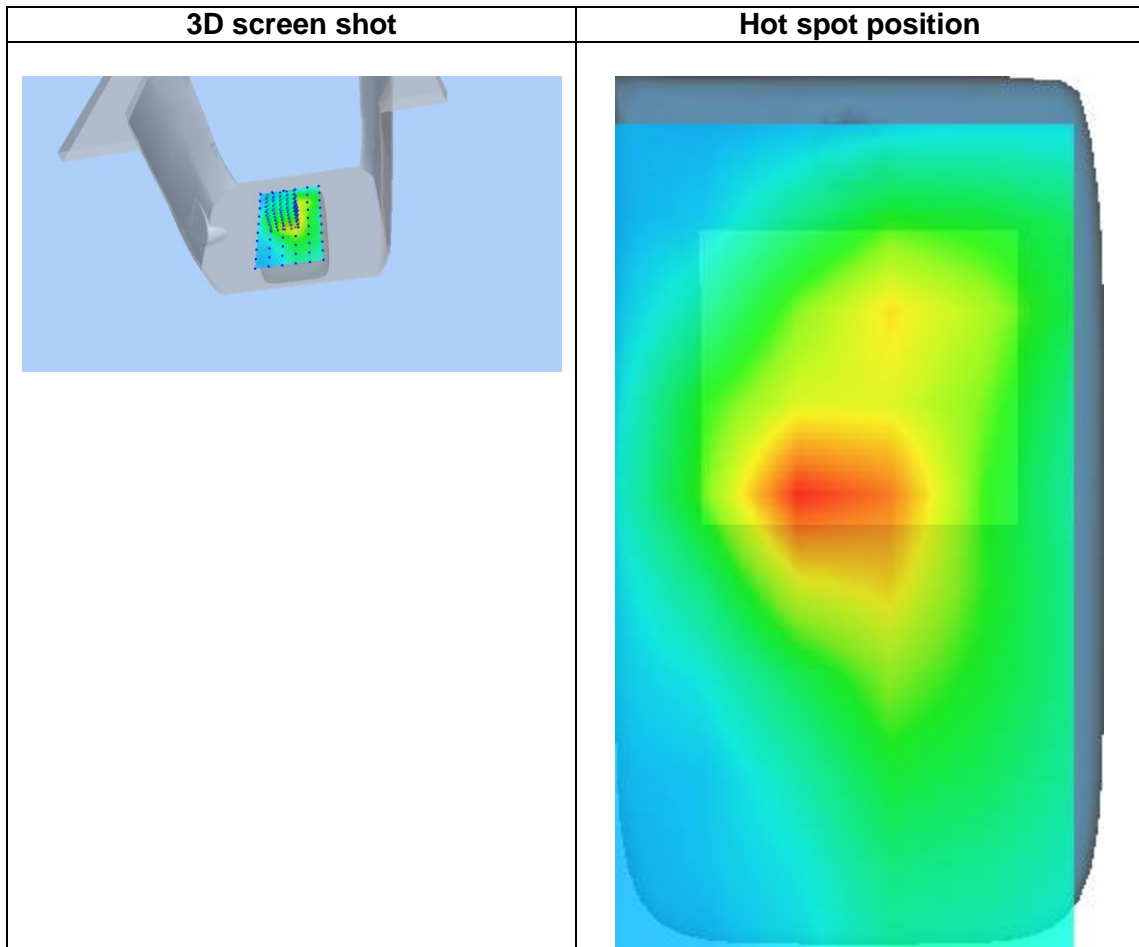
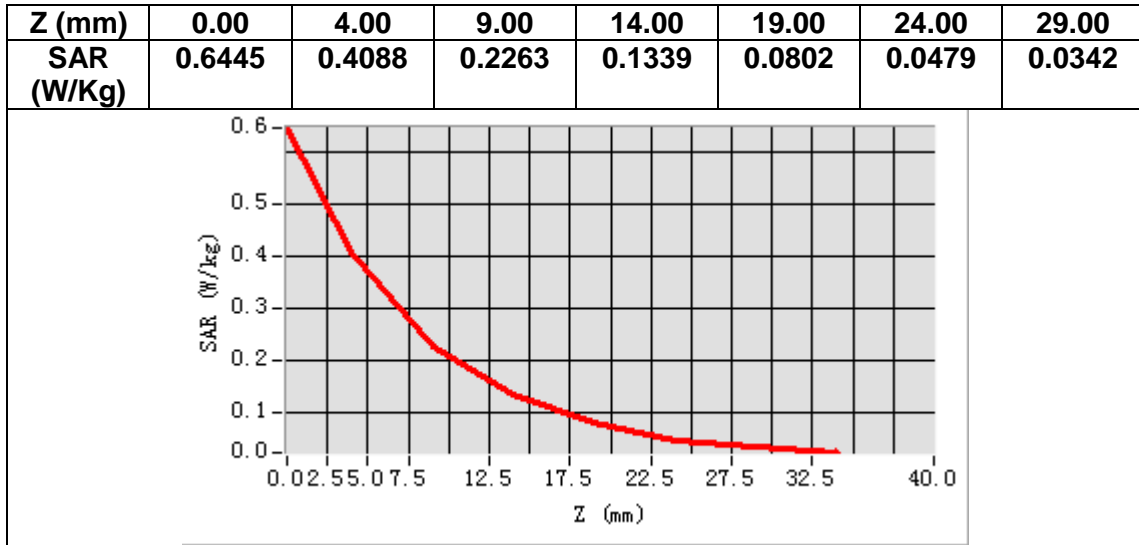
Frequency (MHz)	836.400000
Relative permittivity (real part)	41.404362
Relative permittivity (imaginary part)	19.407654
Conductivity (S/m)	0.901809
Variation (%)	-1.460000



Maximum location: X=-8.00, Y=3.00

SAR Peak: 0.66 W/kg

SAR 10g (W/Kg)	0.202679
SAR 1g (W/Kg)	0.388888



MEASUREMENT 2

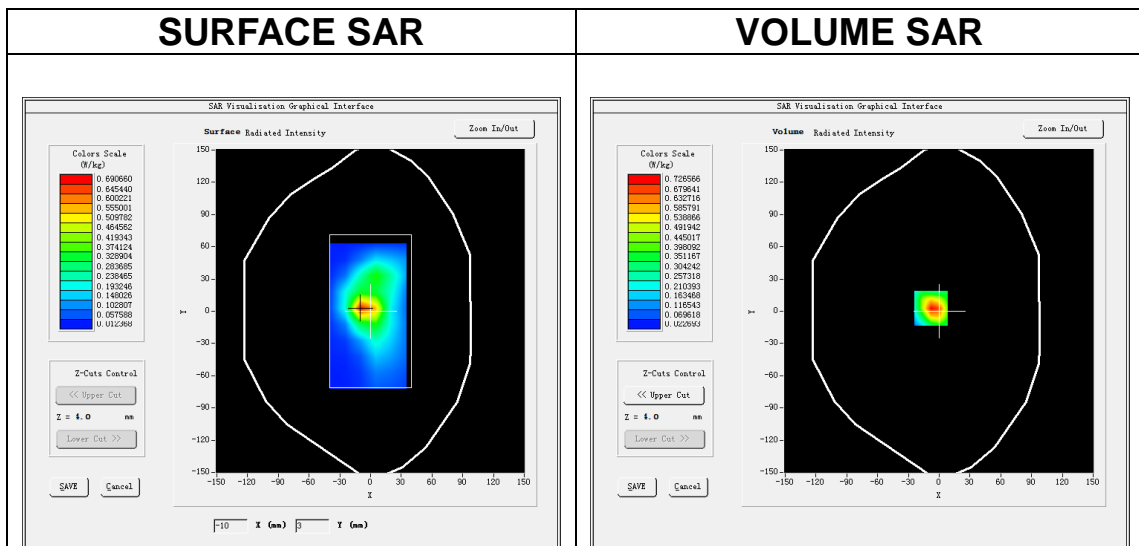
Date of measurement: 25/4/2024

A. Experimental conditions.

Area Scan	<u>dx=15mm dy=15mm, h= 5.00 mm</u>
ZoomScan	<u>5x5x7, dx=8mm dy=8mm dz=5mm</u>
Phantom	<u>Validation plane</u>
Device Position	<u>Body</u>
Band	<u>GSM1900</u>
Channels	<u>Middle</u>
Signal	<u>TDMA (Crest factor: 8.0)</u>
ConvF	<u>2.63</u>

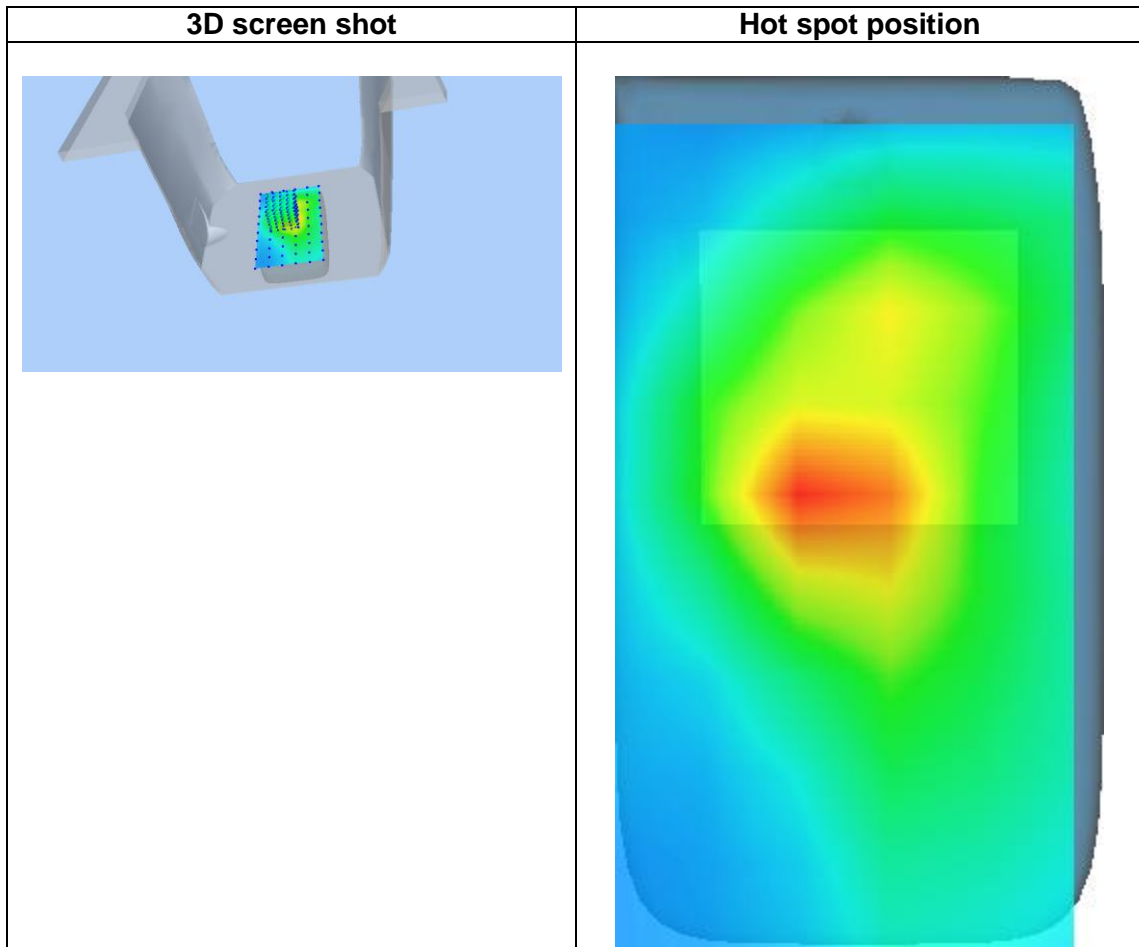
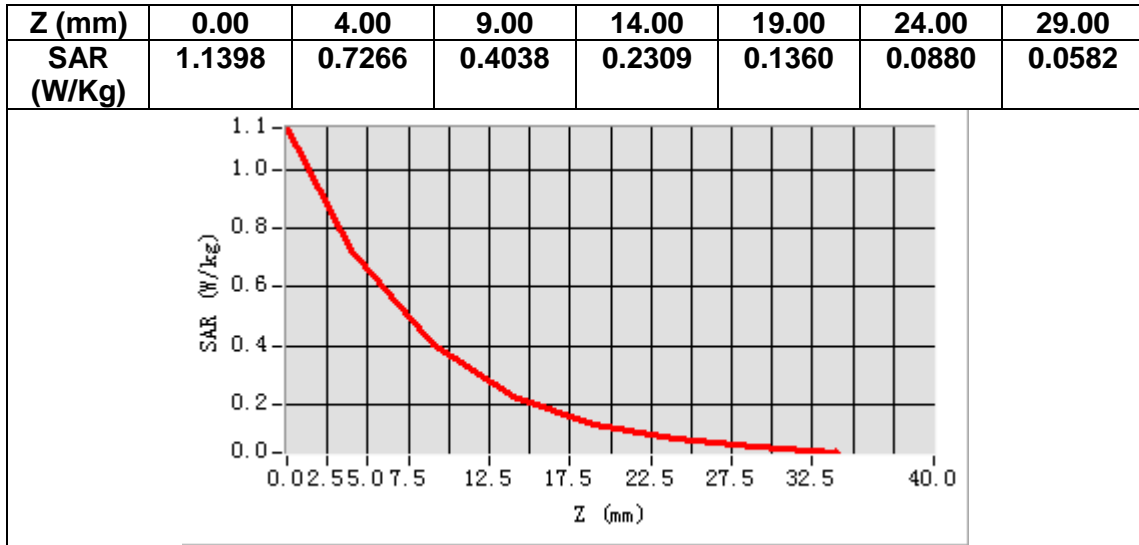
B. SAR Measurement Results

Frequency (MHz)	1880.000000
Relative permittivity (real part)	39.152824
Relative permittivity (imaginary part)	13.908834
Conductivity (S/m)	1.452700
Variation (%)	-0.080000



Maximum location: X=-8.00, Y=3.00
SAR Peak: 1.17 W/kg

SAR 10g (W/Kg)	0.359766
SAR 1g (W/Kg)	0.703628



MEASUREMENT 3

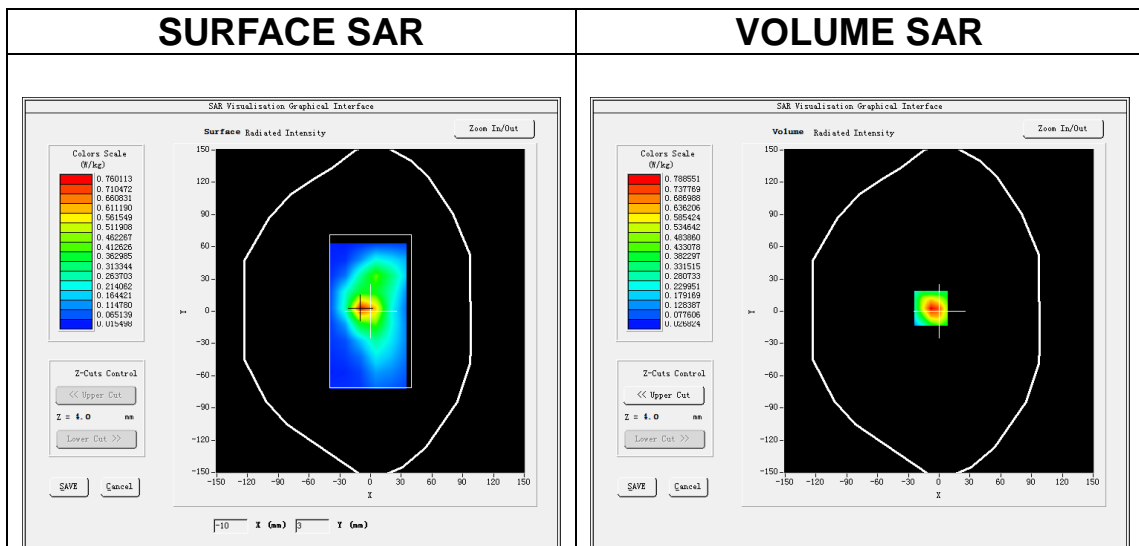
Date of measurement: 25/4/2024

A. Experimental conditions.

Area Scan	<u>dx=15mm dy=15mm, h= 5.00 mm</u>
ZoomScan	<u>5x5x7, dx=8mm dy=8mm dz=5mm</u>
Phantom	<u>Validation plane</u>
Device Position	<u>Body</u>
Band	<u>Band2_WCDMA1900</u>
Channels	<u>Middle</u>
Signal	<u>WCDMA (Crest factor: 1.0)</u>
ConvF	<u>2.63</u>

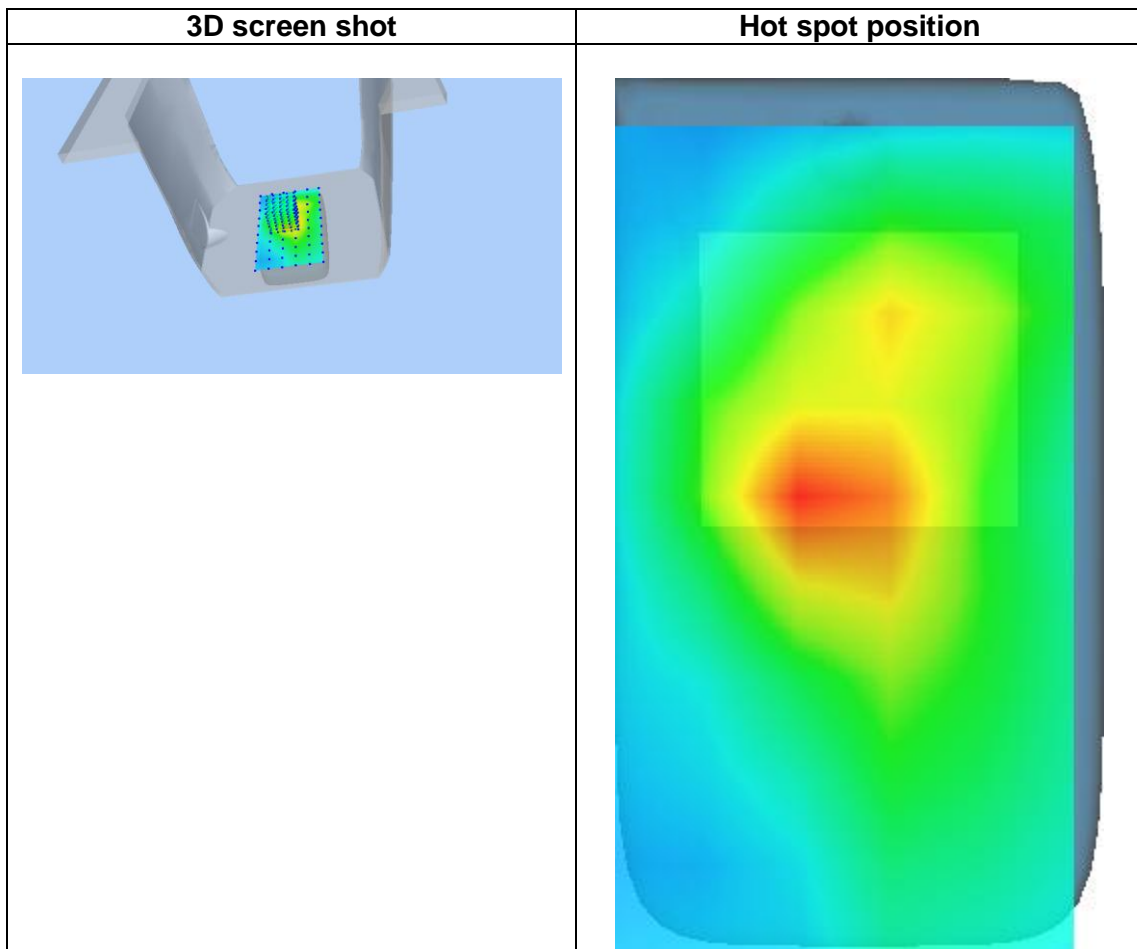
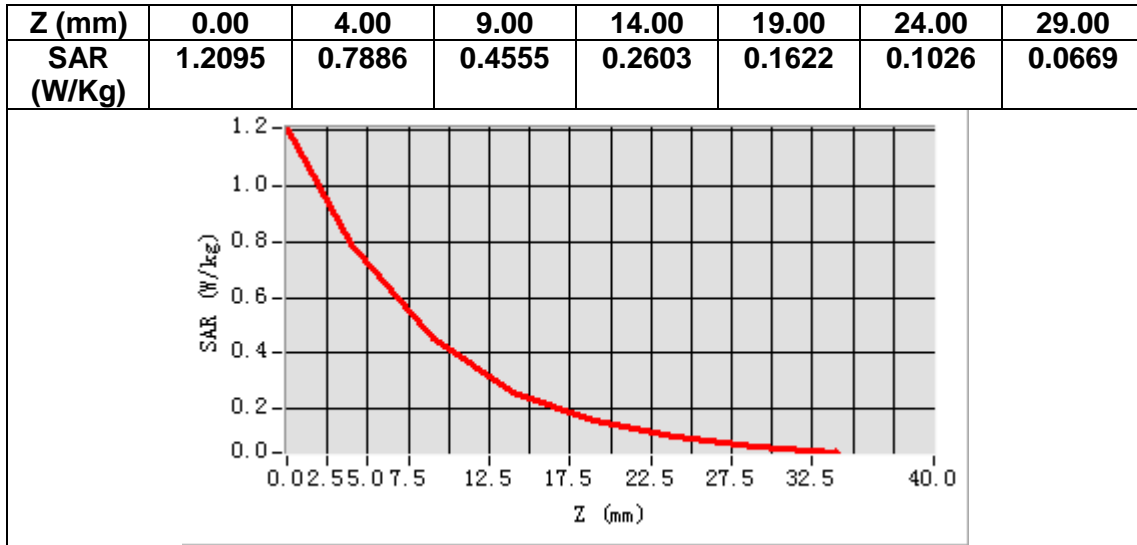
B. SAR Measurement Results

Frequency (MHz)	1880.000000
Relative permittivity (real part)	39.152824
Relative permittivity (imaginary part)	13.908834
Conductivity (S/m)	1.452700
Variation (%)	-1.040000



Maximum location: X=-8.00, Y=3.00
SAR Peak: 1.22 W/kg

SAR 10g (W/Kg)	0.402884
SAR 1g (W/Kg)	0.760011



MEASUREMENT 4

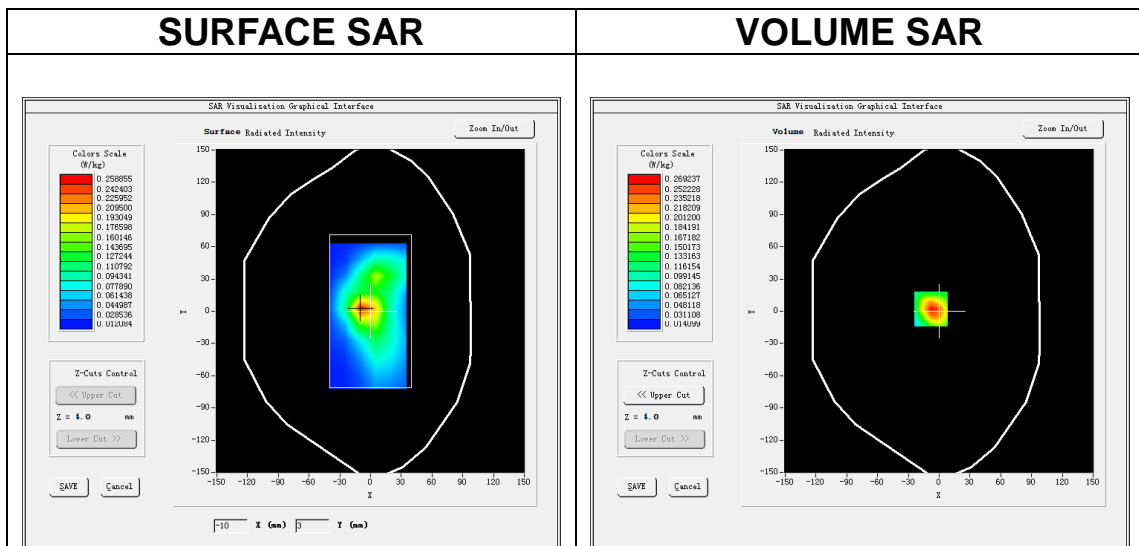
Date of measurement: 26/4/2024

A. Experimental conditions.

Area Scan	<u>dx=15mm dy=15mm, h= 5.00 mm</u>
ZoomScan	<u>5x5x7, dx=8mm dy=8mm dz=5mm</u>
Phantom	<u>Validation plane</u>
Device Position	<u>Body</u>
Band	<u>Band5_WCDMA850</u>
Channels	<u>Middle</u>
Signal	<u>WCDMA (Crest factor: 1.0)</u>
ConvF	<u>2.32</u>

B. SAR Measurement Results

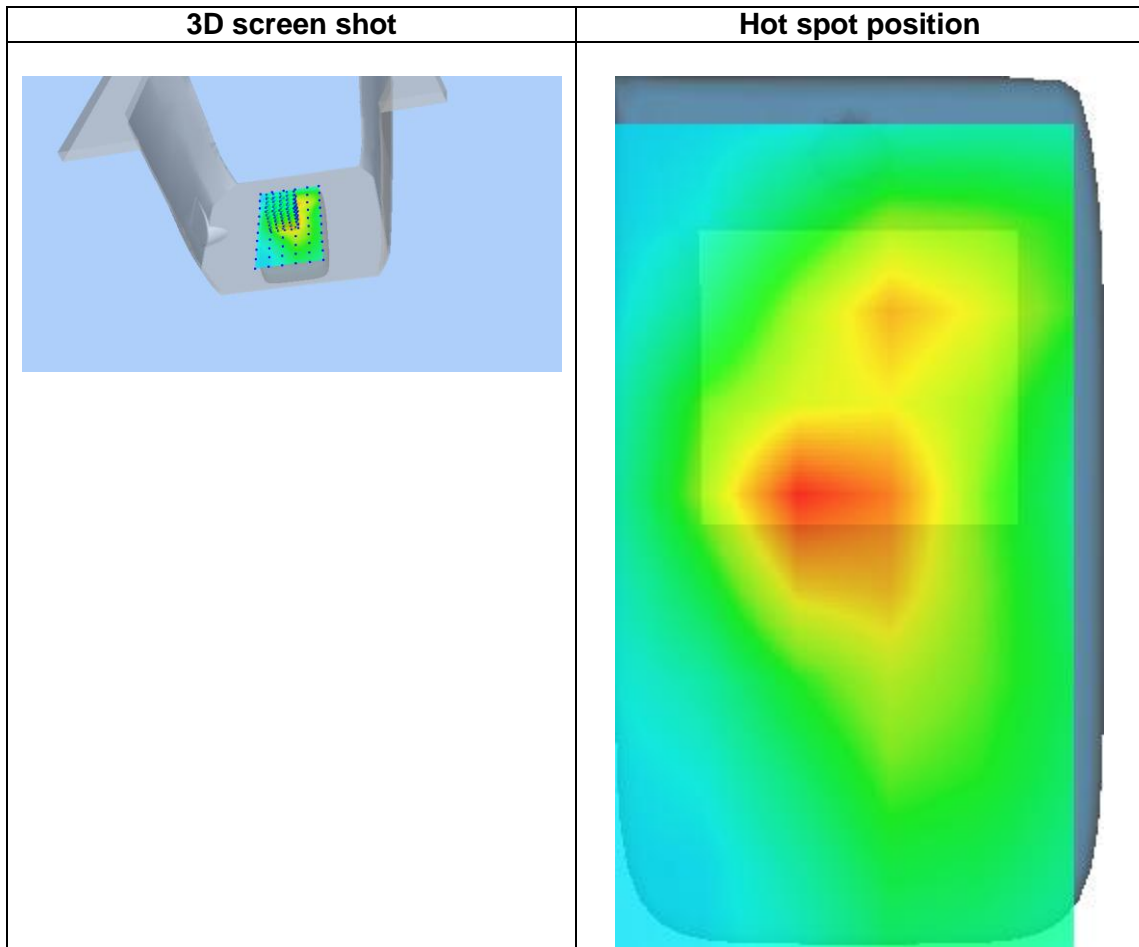
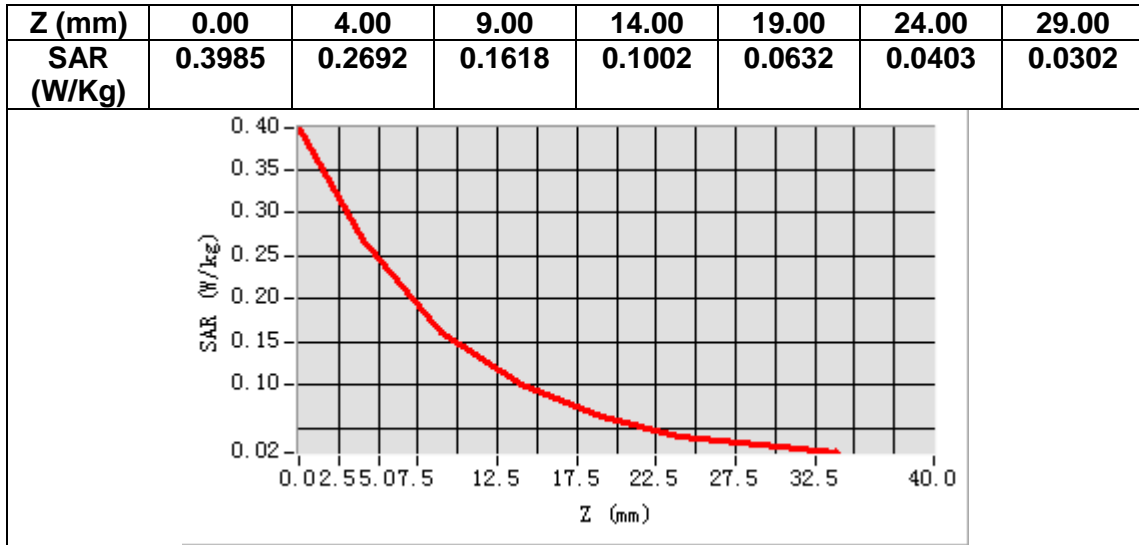
Frequency (MHz)	836.400000
Relative permittivity (real part)	41.404362
Relative permittivity (imaginary part)	19.407654
Conductivity (S/m)	0.901809
Variation (%)	0.220000



Maximum location: X=-8.00, Y=2.00

SAR Peak: 0.40 W/kg

SAR 10g (W/Kg)	0.142670
SAR 1g (W/Kg)	0.254053



12. Appendix D. Calibration Certificate

Table of contents
E Field Probe - 3423-EPGO-426
835 MHz Dipole - SN 03/15 DIP 0G835-347
1900 MHz Dipole - SN 03/15 DIP 1G900-350



COMOSAR E-Field Probe Calibration Report

Ref : ACR.261.11.23.BES.A

**SHENZHEN NTEK TESTING TECHNOLOGY
CO., LTD.**

**BUILDING E, FENDA SCIENCE PARK, SANWEI
COMMUNITY, XIXIANG STREET,
BAO'AN DISTRICT, SHENZHEN GUANGDONG, CHINA
MVG COMOSAR DOSIMETRIC E-FIELD PROBE
SERIAL NO.: 3423-EPGO-426**

Calibrated at MVG

Z.I. de la pointe du diable

**Technopôle Brest Iroise – 295 avenue Alexis de Rochon
29280 PLOUZANE - FRANCE**

Calibration date: 09/18/2023



Accreditations #2-6789
Scope available on www.cofrac.fr

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Summary:

This document presents the method and results from an accredited COMOSAR Dosimetric E-Field Probe calibration performed at MVG, using the CALIPROBE test bench, for use with a MVG COMOSAR system only. The test results covered by accreditation are traceable to the International System of Units (SI).



COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref. ACR.261.11.23.BES.A

	<i>Name</i>	<i>Function</i>	<i>Date</i>	<i>Signature</i>
<i>Prepared by :</i>	Cyrille ONNEE	Measurement Responsible	9/18/2023	
<i>Checked & approved by:</i>	Jérôme Luc	Technical Manager	9/18/2023	
<i>Authorized by:</i>	Yann Toutain	Laboratory Director	9/19/2023	

Yann
Toutain ID

Signature numérique de Yann Toutain ID
Date: 2023.09.19 09:08:14 +02'00'

	<i>Customer Name</i>
<i>Distribution :</i>	SHENZHEN NTEK TESTING TECHNOLOGY CO., LTD.

<i>Issue</i>	<i>Name</i>	<i>Date</i>	<i>Modifications</i>
A	Cyrille ONNEE	9/18/2023	Initial release



COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.261.11.23.BES.A

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COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref: ACR.261.11.23.BES.A

1 DEVICE UNDER TEST

Device Under Test	
Device Type	COMOSAR DOSIMETRIC E FIELD PROBE
Manufacturer	MVG
Model	SSE2
Serial Number	3423-EPGO-426
Product Condition (new / used)	New
Frequency Range of Probe	0.15 GHz-7.5GHz
Resistance of Three Dipoles at Connector	Dipole 1: R1=0.261 MΩ Dipole 2: R2=0.213 MΩ Dipole 3: R3=0.233 MΩ

2 PRODUCT DESCRIPTION

2.1 GENERAL INFORMATION

MVG’s COMOSAR E field Probes are built in accordance to the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards.



Figure 1 – MVG COMOSAR Dosimetric E field Probe

Probe Length	330 mm
Length of Individual Dipoles	2 mm
Maximum external diameter	8 mm
Probe Tip External Diameter	2.5 mm
Distance between dipoles / probe extremity	1 mm

3 MEASUREMENT METHOD

The IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards provide recommended practices for the probe calibrations, including the performance characteristics of interest and methods by which to assess their effect. All calibrations / measurements performed meet the fore-mentioned standards.

3.1 SENSITIVITY

The sensitivity factors of the three dipoles were determined using a two step calibration method (air and tissue simulating liquid) using waveguides as outlined in the standards for frequency range 600-7500MHz and using the calorimeter cell method (transfer method) as outlined in the standards for frequency 150-450 MHz.



COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref. ACR.261.11.23.BES.A

3.2 LINEARITY

The evaluation of the linearity was done in free space using the waveguide, performing a power sweep to cover the SAR range 0.01 W/kg to 100W/kg.

3.3 ISOTROPY

The axial isotropy was evaluated by exposing the probe to a reference wave from a standard dipole with the dipole mounted under the flat phantom in the test configuration suggested for system validations and checks. The probe was rotated along its main axis from 0 to 360 degrees in 15-degree steps. The hemispherical isotropy is determined by inserting the probe in a thin plastic box filled with tissue-equivalent liquid, with the plastic box illuminated with the fields from a half wave dipole. The dipole is rotated about its axis (0°–180°) in 15° increments. At each step the probe is rotated about its axis (0°–360°).

3.4 BOUNDARY EFFECT

The boundary effect is defined as the deviation between the SAR measured data and the expected exponential decay in the liquid when the probe is oriented normal to the interface. To evaluate this effect, the liquid filled flat phantom is exposed to fields from either a reference dipole or waveguide. With the probe normal to the phantom surface, the peak spatial average SAR is measured and compared to the analytical value at the surface.

The boundary effect uncertainty can be estimated according to the following uncertainty approximation formula based on linear and exponential extrapolations between the surface and $d_{be} + d_{step}$ along lines that are approximately normal to the surface:

$$SAR_{uncertainty} [\%] = \Delta SAR_{be} \frac{(d_{be} + d_{step})^2}{2d_{step}} \frac{(e^{-d_{be}/(\delta/2)})}{\delta/2} \text{ for } (d_{be} + d_{step}) < 10 \text{ mm}$$

where

- $SAR_{uncertainty}$ is the uncertainty in percent of the probe boundary effect
- d_{be} is the distance between the surface and the closest *zoom-scan* measurement point, in millimetre
- Δ_{step} is the separation distance between the first and second measurement points that are closest to the phantom surface, in millimetre, assuming the boundary effect at the second location is negligible
- δ is the minimum penetration depth in millimetres of the head tissue-equivalent liquids defined in this standard, i.e., $\delta \approx 14 \text{ mm}$ at 3 GHz;
- ΔSAR_{be} in percent of SAR is the deviation between the measured SAR value, at the distance d_{be} from the boundary, and the analytical SAR value.

The measured worst case boundary effect SARuncertainty[%] for scanning distances larger than 4mm is 1.0% Limit ,2%).



COMOSAR E-FIELD PROBE CALIBRATION REPORT

Ref. ACR.261.11.23.BES.A

4 MEASUREMENT UNCERTAINTY

The guidelines outlined in the IEC/IEEE 62209-1528 and FCC KDB865664 D01 standards were followed to generate the measurement uncertainty associated with a SAR probe calibration using the waveguide or calorimetric cell technique depending on the frequency.

The estimated expanded uncertainty (k=2) in calibration for SAR (W/kg) is +/-11% for the frequency range 150-450MHz.

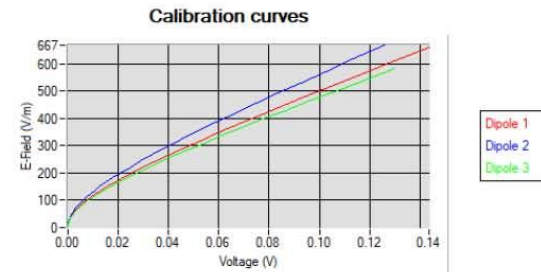
The estimated expanded uncertainty (k=2) in calibration for SAR (W/kg) is +/-14% for the frequency range 600-7500MHz.

5 CALIBRATION RESULTS

Ambient condition	
Liquid Temperature	20 +/- 1 °C
Lab Temperature	20 +/- 1 °C
Lab Humidity	30-70 %

5.1 CALIBRATION IN AIR

The following curve represents the measurement in waveguide of the voltage picked up by the probe toward the E-field generated inside the waveguide.



From this curve, the sensitivity in air is calculated using the below formula.

$$E^2 = \sum_{i=1}^3 \frac{V_i (1 + V_i / DCP_i)}{Norm_i}$$

where

Vi=voltage readings on the 3 channels of the probe

DCPi=diode compression point given below for the 3 channels of the probe

Normi=dipole sensitivity given below for the 3 channels of the probe



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Ref: ACR.261.11.23.BES.A

Normx dipole 1 ($\mu\text{V}/(\text{V}/\text{m}^2)$)	Normy dipole 2 ($\mu\text{V}/(\text{V}/\text{m}^2)$)	Normz dipole 3 ($\mu\text{V}/(\text{V}/\text{m}^2)$)
0.78	0.62	0.85

DCP dipole 1 (mV)	DCP dipole 2 (mV)	DCP dipole 3 (mV)
105	108	107

5.2 CALIBRATION IN LIQUID

The calorimeter cell or the waveguide is used to determine the calibration in liquid using the formula below.

$$ConvF = \frac{E_{liquid}^2}{E_{air}^2}$$

The E-field in the liquid is determined from the SAR measurement according to the below formula.

$$E_{liquid}^2 = \frac{\rho SAR}{\sigma}$$

where

σ =the conductivity of the liquid

ρ =the volumetric density of the liquid

SAR=the SAR measured from the formula that depends on the setup used. The SAR formulas are given below

For the calorimeter cell (150-450 MHz), the formula is:

$$SAR = c \frac{dT}{dt}$$

where

c =the specific heat for the liquid

dT/dt =the temperature rises over the time

For the waveguide setup (600-75000 MHz), the formula is:

$$SAR = \frac{4P_w}{ab\delta} e^{-\frac{2z}{\delta}}$$

where

a =the larger cross-sectional of the waveguide

b =the smaller cross-sectional of the waveguide

δ =the skin depth for the liquid in the waveguide

P_w =the power delivered to the liquid